

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP PR
LLC, JENNIFER ABEL, JED WALLACE, and
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL
(consolidated with 1:25-cv-00449-LJL)

JENNIFER ABEL,

Third-Party Plaintiff,

-v-

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, IT ENDS WITH US
MOVIE LLC, MELISSA NATHAN, JENNIFER
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., and THE NEW
YORK TIMES COMPANY.

Consolidated Defendants.

DECLARATION OF STEPHANIE A. ROESER
IN SUPPORT OF BLAKE LIVELY'S MOTION FOR A PROTECTIVE ORDER

I, Stephanie A. Roeser, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Manatt, Phelps & Phillips LLP, 2049 Century Park East, Los Angeles, CA 90067, and counsel of record for Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively's Letter-Motion for a protective order relieving her from producing documents responsive to the Wayfarer Parties' requests for production numbered 108-109 ("RFPs 108-109") (the "Motion").

3. On April 28, 2025, the Wayfarer Parties noticed a subpoena to Venable LLC seeking communications between Ms. Swift's lawyer and Ms. Lively's counsel. On May 8, 2025, the Wayfarer Parties noticed a subpoena for documents and deposition testimony to Taylor Swift (the "Subpoenas"). On May 22, 2025, the Wayfarer Parties withdrew the Subpoenas.

4. On May 22, 2025, my co-counsel at Willkie Farr & Gallagher LLP sent an email to the Wayfarer Parties' counsel, on which I was copied, noting that there was at least one public report that the Wayfarer Parties had withdrawn the Subpoenas¹ because "they got exactly what they were seeking." The email requested that the Wayfarer Parties produce any documents or communications concerning Ms. Lively obtained from any third party, which would be responsive to Ms. Lively's requests for production, and the production of which is required under the terms of the operative Protective Order.

5. The Wayfarer Parties did not respond to the May 22, 2025 email.

6. On Monday June 9, 2025 at 5:22 p.m. Eastern Standard Time, my co-counsel sent an email to the Wayfarer Parties' counsel, on which I was copied, setting forth Ms. Lively's

¹ Capitalized terms herein are defined as in the Motion.

understanding that, in light of their public statements, the Wayfarer Parties would withdraw RFPs 108-109, and requesting their availability for a conferral to discuss the issue.

7. The next day, during a conferral of a separate issue in which I participated, my co-counsel asked counsel for the Wayfarer Parties whether they were prepared to speak on RFPs 108-109 and provide their position, as they had not yet responded to the email inquiry or provided their availability.

8. Counsel for the Wayfarer Parties responded that they were not ready to discuss the issue, and have still not made themselves available to meet and confer on the issue.

9. I also submit this declaration to place before the Court true and correct copies of the following documents.

10. A true and correct copy of the Wayfarer Parties' First Request for Production of Documents and Things to Lively, dated February 21, 2025 is attached hereto as **Exhibit A**.

11. A true and correct copy of an email chain spanning from May 22, 2025 through June 9, 2025 between counsel for Ms. Lively and counsel for the Wayfarer Parties regarding the Subpoenas, is attached hereto as **Exhibit B**.

12. A true and correct copy of the Wayfarer Parties' Notice of Intention to Serve Subpoena on Taylor Swift, dated May 8, 2025, is attached hereto as **Exhibit C**.

13. A true and correct copy of an email chain spanning from May 12, 2025 through May 22, 2025 between counsel for Ms. Lively and counsel for Ms. Swift regarding the withdrawal of the Subpoenas, is attached hereto as **Exhibit D**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: June 13, 2025

/s/ Stephanie A. Roeser

MANATT, PHELPS & PHILLIPS, LLP
Esra A. Hudson
Stephanie A. Roeser (admitted *pro hac vice*)
2049 Century Park East, Suite 1700
Los Angeles, California 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com

Matthew F. Bruno
Manatt, Phelps & Phillips, LLP
7 Times Sq
New York, NY 10036
(212) 790-4500
mbruno@manatt.com

WILLKIE FARR & GALLAGHER LLP
Michael J. Gottlieb
Kristin E. Bender
Meryl Governski (admitted *pro hac vice*)
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com
mgovernski@willkie.com

Aaron Nathan
Willkie Farr & Gallagher LLP
787 7th Avenue
New York, NY 10019
(212) 728-8000
anathan@willkie.com

Counsel for Blake Lively